

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JEFFREY SAHL FERRIS

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 13, 113(a)(3),
924(c)(1)(A)(iii), 924(d), 1152, 3559(f),
and 2; 28 U.S.C. § 2461(c); and N.D.C.C.
§§ 12.1-17-03, 12.1-17-04, and 12.1-32-01

COUNT ONE

Reckless Endangerment

The Grand Jury Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and
within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, created a substantial risk of serious bodily injury or death to another,
namely, B.B., S.L., E.D., K.D., J.M., Z.P., and W.D., Indians, and the circumstances
manifested an extreme indifference to the value of human life by driving a Jeep vehicle in
excessive speeds in the direction of and nearly striking B.B., S.L., E.D., K.D., J.M., Z.P.,
and W.D. with said Jeep vehicle;

In violation of Title 18, United States Code, Sections 13 and 1152; and North
Dakota Century Code, Sections 12.1-17-03 and 12.1-32-01.

COUNT TWO

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted S.L., an Indian, with a dangerous weapon, namely, a Jeep vehicle, with intent to do bodily harm to S.L.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT THREE

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted E.D., an Indian, with a dangerous weapon, namely, a Jeep vehicle, with intent to do bodily harm to E.D.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT FOUR

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted K.D., an Indian, with a dangerous weapon, namely, a Jeep vehicle, with intent to do bodily harm to K.D.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT FIVE

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted J.M., an Indian, with a dangerous weapon, namely, a Jeep vehicle, with intent to do bodily harm to J.M.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT SIX

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted Z.P., an Indian, with a dangerous weapon, namely, a Jeep vehicle, with intent to do bodily harm to Z.P.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT SEVEN

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted B.B., an Indian minor under the age of 18, with a dangerous weapon, namely, a Jeep vehicle, with intent to do bodily harm to B.B.;

In violation of Title 18, United States Code, Sections 113(a)(3), 1152, and 3559(f).

COUNT EIGHT

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted W.D., an Indian, with a dangerous weapon, namely, a Jeep vehicle, with intent to do bodily harm to W.D.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT NINE

Terrorizing

The Grand Jury Further Charges:

On or about April 24 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, with intent to place another human being, namely, B.B., an Indian, in fear for his and another's safety, and in reckless disregard of the risk of causing such terror, threatened to commit a crime of violence and act dangerous to human life, by brandishing a firearm at B.B.;

In violation of Title 18, United States Code, Sections 13 and 1152, and North Dakota Century Code, Sections 12.1-17-04 and 12.1-32-01.

COUNT TEN

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

JEFFREY SAHL FERRIS,

a non-Indian, assaulted B.B., an Indian, with a dangerous weapon, namely, a Taurus PT111 G2 9mm firearm, serial number TKY86292, with intent to do bodily harm to B.B.;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT ELEVEN

Use of a Firearm in Relation to a Felony Crime of Violence

The Grand Jury Further Charges:

On or about April 24, 2020, in the District of North Dakota,

JEFFREY SAUL FERRIS

did knowingly use a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Reckless Endangerment and Assault with a Dangerous Weapon, as set forth in Counts Nine and Ten above;

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of the offense alleged in this Indictment,

JEFFREY SAUL FERRIS

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including, but not limited to:

- One Taurus PT111 G2 9mm firearm, serial number TKY86292.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Drew H. Wrigley

DREW H. WRIGLEY
United States Attorney

DMD/vt